

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MARY E. SHEPARD and the ILLINOIS )  
STATE RIFLE ASSOCIATION, )

Plaintiff, )

-vs- )

No. 11-405

LISA M. MADIGAN, solely in her official )  
capacity as ATTORNEY GENERAL OF )  
ILLINOIS, GOVERNOR PATRICK J. )  
QUINN, solely in his official capacity as )  
Governor of the State of Illinois, )  
TYLER R. EDMONDS, solely in his )  
official capacity as the State's Attorney )  
of Union County, Illinois, and SHERIFF )  
DAVID LIVESAY, solely in his official )  
capacity as Sheriff of Union County, )

Defendants. )

**MOTION FOR ENLARGEMENT OF TIME**

Now come defendants, Lisa Madigan, Attorney General of the State of Illinois; Patrick J. Quinn, Governor of the State of Illinois; and Tyler R. Edmonds, State's Attorney of Union County, Illinois, by their attorney, Lisa Madigan, Attorney General of the State of Illinois, and, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, move this honorable Court for an enlargement of time of 30 days, until July 8, 2011, in which to answer plaintiff's complaint or otherwise plead.

In support thereof, it is stated:

1. The undersigned is one of the attorneys assigned to represent defendants in this matter.
2. The answer of defendant Edmonds is due on or about June 8, 2011.
3. The answers of defendants Madigan and Quinn are due on June 9, 2011.
4. Within the last year, the United States Supreme Court held that the Second Amendment was applicable to the state. *McDonald v. City of Chicago*, \_\_ U.S. \_\_, 130

S.Ct. 3020 (2010).

5. Prior to the time the law of this Court was that the Second Amendment was not applicable to the states. *National Rifle Association, Inc. v. City of Chicago*, 567 F.3d 856 (7<sup>th</sup> Cir. 2009).

6. Because the Second Amendment has not been held applicable to the states, the undersigned has little experience with Second Amendment issues.

7. The undersigned has been busy with a motion for summary judgment in another matter and has not had time to fully research the issues.

8. The undersigned and Karen L. McNaught, who is also assigned to this case, will each be taking vacations during June 2011.

9. Additional time is needed to complete research and prepare a proper response to plaintiff's complaint.

WHEREFORE, defendants respectfully request additional time of 30 days, up to and including July 8, 2011, within which to answer plaintiff's complaint or otherwise plead.

Respectfully submitted,

LISA MADIGAN, ATTORNEY GENERAL OF  
THE STATE OF ILLINOIS; PATRICK J. QUINN,  
GOVERNOR OF THE STATE OF ILLINOIS; and  
TYLER R. EDMONDS, STATE'S ATTORNEY  
OF UNION COUNTY, ILLINOIS,

Defendants,

Terence J. Corrigan, #6191237  
Assistant Attorney General  
Attorney for Defendants  
500 South Second Street  
Springfield, IL 62706  
Telephone: (217) 782-5819  
Facsimile: (217) 524-5091  
tcorrigan@atg.state.il.us

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LISA MADIGAN, Attorney General  
State of Illinois,

Attorney for Defendants.

By: /s/Terence J. Corrigan  
Terence J. Corrigan  
Assistant Attorney General

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2011, I electronically filed Defendants' Motion for Enlargement of Time with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

[whoward@freebornpeters.com](mailto:whoward@freebornpeters.com)

and I hereby certify that on June 6, 2011, I mailed by United States Postal Service, the document to the following nonregistered participant:

None

Respectfully submitted,

By: /s/Terence J. Corrigan

Terence J. Corrigan  
Assistant Attorney General  
Attorney for Defendant(s)  
500 South Second Street  
Springfield, IL 62706  
Telephone: (217) 782-5819  
Facsimile: (217) 524-5091  
[tcorrigan@atg.state.il.us](mailto:tcorrigan@atg.state.il.us)